

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

JESSICA DE LA ROSA, JEAN RYAN,
BRONX INDEPENDENT LIVING SERVICES,
BROOKLYN CENTER FOR INDEPENDENCE
OF THE DISABLED, CENTER FOR
INDEPENDENCE OF THE DISABLED, NEW
YORK, DISABLED IN ACTION OF
METROPOLITAN NEW YORK, HARLEM
INDEPENDENT LIVING CENTER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

-against-

METROPOLITAN TRANSPORTATION
AUTHORITY, JANNO LIEBER, in his official
capacity as chair and chief executive officer of
the Metropolitan Transportation Authority, NEW
YORK CITY TRANSIT AUTHORITY,
RICHARD DAVEY, in his official capacity as
President of the New York City Transit
Authority, and the CITY OF NEW YORK.

Defendants.

No. 19-cv-4406 (ER)

**NOTICE OF MOTION FOR CLASS
CERTIFICATION AND
PRELIMINARY APPROVAL OF
SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiffs will and hereby do move this Court for an order certifying the proposed Settlement Class, appointing the Plaintiffs as Class representatives, appointing Plaintiffs' counsel as Class Counsel, preliminarily approving the proposed Settlement Agreement, and approving the proposed notices and proposed schedule for disseminating the notice and seeking Final Approval.

This Motion is based upon this Notice; the accompanying Memorandum of Law; the declaration of Stuart Seaborn and all supporting exhibits; the declaration of Daniel L. Brown and all supporting exhibits; the declarations of Jessica De La Rosa, Jean Ryan, Brett Eisenberg,

Joseph G. Rappaport, Sharon McLennon-Wier, and Yonette Lewis; all pleadings and other documents on file in this action; all matters of which the Court may or must take judicial notice, and any argument or evidence that may be presented at the hearing in this matter, if a hearing is deemed necessary.

Dated: September 27, 2022

New York, New York

Respectfully submitted,

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s/ Chloe Holzman

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Rebecca Rodgers

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